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July 13, 2022

VIA CM/ECF

Hon. Denise L. Cote
United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *In re LATAM Airlines Group, S.A.*, No. 22-cv-5891

Dear Judge Cote:

We, along with Paul Hastings LLP, are counsel for the Ad Hoc Group of TLA Claimholders (collectively, "the Group"). The Group is appealing the opinion and order of the bankruptcy court confirming the plan of reorganization proposed by LATAM Airlines Group S.A. ("the Debtors") to challenge the denial of post-petition interest.

We have conferred with the Debtors regarding the briefing schedule in this appeal. We and the Debtors agree that it is appropriate to expedite the briefing in this appeal and jointly propose that the Court adopt the following schedule:

Appellant's Opening Brief: July 18, 2022

Appellees' Response Brief: August 8, 2022

Appellant's Reply Brief: August 15, 2022.

The parties acknowledge that their agreement on a schedule does not waive and is without prejudice to any arguments they may have with respect to equitable mootness.

Sincerely,

/s/ Matthew D. McGill

Matthew D. McGill

cc: Counsel of Record via CM/ECF

So ordered.

Denise Cote
7/13/22